

August 10, 2021

Via First-Class Mail

Regional Freedom of Information Officer
U.S. EPA, Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

c/o: National FOIA Office
U.S. Environmental Protection Agency,
1200 Pennsylvania Avenue NW (2310A)
Washington, DC 20460

RE: Freedom of Information Act Request

Dear Regional Freedom of Information Officer:

This is a request under the Freedom of Information Act (5 U.S.C. § 552) and implementing regulations of the Environmental Protection Agency ("EPA") (40 CFR 2.101). I request that copies of the following documents, or documents containing the following information, be provided to me:

- Documents concerning Solicitation W912WJ-20-R-0003, or any other Solicitation ("Solicitation(s)") issued in or about October 2019 through or by the U.S. Army Corps of Engineers, New England District ("CENAE") for work on an EPA investigation and cleanup project on the Housatonic River known as the Housatonic River site, EPA site MAD980672935, said Solicitation being for the continuation of work then being performed by Bluestone Environmental Group, Inc. under a 2014 contract for EPA work issued and administered through CENAE, designated as IDIQ W912WJ-14-D-003, and including but not limited to:
 - The Solicitation(s);
 - Public announcements or communications regarding the issuance of the Solicitation(s);
 - Proposals submitted in response to the Solicitation(s);
 - Communications between EPA and CENAE regarding the Solicitation(s);
 - Communications between any EPA employee and any person outside EPA regarding the Solicitation(s);

- Records of or relating to the selection board for the procurement under the Solicitation(s), including minutes, communications, notes, or other documents relating to the work of the selection board;
- Documents relating to EPA's authorization for the funding of the work to be performed under the contract anticipated to arise from the Solicitation(s);
- Documents relating to EPA's revocation or withdrawal of funding for, or revocation or withdrawal of authorization for performance of, the work to be performed under the contract anticipated to arise from the Solicitation(s) issued through CENAE;
- Documents concerning Task Order No. RAF DES CLIN001, the current Task Order, and all intervening Task Orders, if any, and work being performed on an EPA investigation and cleanup project on the Housatonic River, EPA site MAD980672935, said Task Order(s) being for the continuation of work previously performed by Bluestone Environmental Group, Inc. under a 2014 contract for EPA work issued and administered through CENAE, designated as IDIQ W912WJ-14-D-003, and including but not limited to:
 - The Task Order(s);
 - Public announcements or communications regarding the issuance of the Task Order (s);
 - Proposals submitted in response to the Task Order(s);
 - Communications between EPA and CENAE regarding the Task Order;
 - Communications between any EPA employee and any person outside EPA regarding the Task Order(s);
 - Records of or relating to the selection board for the procurement under the Task Order(s), including minutes, communications, notes, or other documents relating to the work of the selection board;
 - Documents relating to EPA's authorization for the funding of the work to be performed under the Task Order(s);
 - The current contractors and subcontractors working at EPA site MAD 980672935, as well as:
 - the contracts and subcontracts between EPA and any contractors or subcontractors
 - the contracts and subcontracts between the contractors and subcontractors
 - Records of or relating to the EPA's approval of any contractors or subcontractors under the current Task Order, including but not limited to Taconic Ridge Environmental, Inc.
 - Documents relating to:

- Any correspondence or communication between Dean Tagliaferro, On-Scene Coordinator and Remedial Project Manager at the GE-Housatonic River site, and Izabela Zapisek between the years of 2019 and 2021;
- Any correspondence or communication between Jessica Kidd, Chief of the Contracts Branch of CENAE, and Izabela Zapisek between the years of 2019 and 2021;
- Any correspondence or communication between HDR, Inc., and Izabela Zapisek between the years of 2019 and 2021;
- Any correspondence or communication between Weston Solutions and Izabela Zapisek between the years of 2019 and 2021;
- Any correspondence or communication between Stantec, Inc., and Izabela Zapisek between the years of 2019 and 2021;
- Any correspondence or communication between any official at the EPA or CENAE and Izabela Zapisek between the years of 2019 and 2021;
- Any correspondence or communication between Dean Tagliaferro, On-Scene Coordinator and Remedial Project Manager at the GE-Housatonic River site, and Scott Campbell between the years of 2019 and 2021;
- Any correspondence or communication between Jessica Kidd, Chief of the Contracts Branch of CENAE, and Scott Campbell between the years of 2019 and 2021;
- Any correspondence or communication between HDR, Inc., and Scott Campbell between the years of 2019 and 2021;
- Any correspondence or communication between Weston Solutions and Scott Campbell between the years of 2019 and 2021;
- Any correspondence or communication between Stantec, Inc., and Scott Campbell between the years of 2019 and 2021;
- Any correspondence or communication between any official at the EPA or CENAE and Scott Campbell between the years of 2019 and 2021;
- Any correspondence or communication between Dean Tagliaferro, On-Scene Coordinator and Remedial Project Manager at the GE-Housatonic River site, and Taconic Ridge Environmental, Inc. between the years of 2019 and 2021;
- Any correspondence or communication between Jessica Kidd, Chief of the Contracts Branch of CENAE, and Taconic Ridge Environmental, Inc. between the years of 2019 and 2021;
- Any correspondence or communication between HDR, Inc., and Taconic Ridge Environmental, Inc., between the years of 2019 and 2021;
- Any correspondence or communication between Weston Solutions and Taconic Ridge Environmental, Inc., between the years of 2019 and 2021;
- Any correspondence or communication between Stantec, Inc., and Taconic Ridge Environmental, Inc., between the years of 2019 and 2021;
- Any correspondence or communication between any official at the EPA or CENAE and Taconic Ridge Environmental, Inc. between the years of 2019 and 2021;

- Any documents not previously produced pertaining to or involving Izabela Zapisek, Scott Campbell, or Taconic Ridge Environmental, Inc. between the years of 2019 and 2021.

Unless otherwise specified, the date range applicable to this request is January 1, 2019 through the present. The term "documents" as used herein refers to all agency records obtainable under the FOIA, including print documents, photographs, videos, maps, e-mail and electronic records that were created or obtained by the EPA and are, at the time the request is filed, in that agency's possession and control.

The EPA employees that are most likely to have such documentation include Mr. Dean Tagliaferro, On-Scene Coordinator and Remedial Project Manager at the GE-Pittsfield/Housatonic River Superfund site, and Jessica Kidd, Chief of the Contracts Branch at CENAE, and others at the Region 1 EPA office, 5 Post Office Square, Suite 100, Boston, MA 02109-3912.

We are a law firm making this request on behalf of a commercial client.

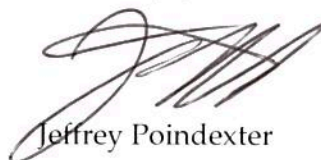
Should you determine that some portion of the documents are exempt from disclosure, we request that you release any reasonably segregable portion of the document or documents which is not exempt. We reserve our rights to appeal such a decision.

If you determine that a requested document, or any portion of a requested document, is exempt from disclosure, please note the applicable statutory exemption and explain why it applies to the requested record.

Please mail to us the documents requested above. In compliance with applicable regulations, we agree to pay reasonable search and copying charges. If the fees will exceed \$300.00, please telephone me before you fill my request. We look forward to your response within twenty working days of your receipt of this request.

Please contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,



Jeffrey Poindexter